

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES
LLC, MONTGOMERY TECHNOLOGIES
LLC, VIRGIL QUANTITATIVE
RESEARCH, LLC, VIRGIL CAPITAL LLC,
and VQR PARTNERS LLC,

Defendants.

Case No.: 20-cv-10849 (JGLC)

**[PROPOSED] ORDER GRANTING RECEIVER'S MOTION
TO COMPEL TURNOVER OF ASSETS**

WHEREAS this matter has come before the Court upon motion of the Court-appointed receiver, Robert A. Musiala, Jr. ("Receiver"), seeking an order ("Order") (i) declaring as Receivership Property (a) the 20.03 BTC held in an unhosted wallet ending in vwca ("Adaya BTC Wallet") and (b) \$3,000,662.96 worth of digital assets that were diverted from the Receivership Estate between March 2019 and December 2020 and deposited into an account on the Binance exchange registered to Phuong Nguyen ("Nguyen Account") (collectively, "Disputed Assets"); and (ii) requiring Nasir Adaya ("Adaya") and Nguyen to turnover the Disputed Assets, or the financial equivalent thereof, to the Receiver ("Motion");

WHEREAS Plaintiff, the United States Securities and Exchange Commission does not oppose the relief requested herein;

IT IS HEREBY ORDERED THAT:

1. The Receiver's Motion is GRANTED;
2. The Disputed Assets constitute Receivership Property, as that term is defined in the Order Appointing Receiver;
3. Within two (2) business days following the entry of this Order, the Receiver shall notify the Binance exchange of the contents of this Order, and shall request that the current freeze on the Nguyen Account be lifted so as to facilitate the turnover of the Disputed Assets to the Receiver;
4. Within five (5) business days following the entry of this Order, Adaya shall transfer the 20.03 BTC in the Adaya BTC Wallet to the custody of the Receiver's insured institutional cryptocurrency account;
5. Within five (5) business days following the entry of this Order, Phuong shall turnover to the Receiver assets from the Nguyen Account equal to \$3,000,662.96 in value;
6. The Court retains jurisdiction to enforce and implement the terms and provisions of this order.

Dated: August ___, 2023

JESSICA G.L. CLARKE
UNITED STATES DISTRICT JUDGE